

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

RICHARD IRVING BECKMAN)	
AND KARI ANN BECKMAN,)	
)	
Plaintiff,)	
)	Civil Action No. 1:23-cv-06000-SEG
v.)	
)	
REGINA CAELI, INC. a/k/a)	
REGINA CAELI ACADEMY AND)	
FATHER AUGUSTINE TRAN)	
)	
Defendants.)	

DEFENDANT REGINA CAELI, INC. a/k/a REGINA CAELI ACADEMY'S
NOTICE OF NO OPPOSITION TO AND JOINDER IN DEFENDANT
FATHER AUGUSTINE TRAN'S MOTION TO STAY PRELIMINARY
DEADLINES – AUGMENTED WITH REQUEST THAT STAY APPLY TO
ALL PENDING DISPOSITIVE MOTIONS

Defendant Regina Caeli, Inc. a/k/a Regina Caeli Academy (“RCA”) hereby files its Notice of No Opposition to and Joinder in Defendant Father Augustine Tran’s (“Fr. Tran”) Motion to Stay Preliminary Deadlines [Doc. 71] Pending the Court’s Ruling on Fr. Tran’s Motion to Dismiss [Doc. 70] (“Motion”).

RCA respectfully submits the Motion should be granted and preliminary deadlines should be stayed pending ruling on all dispositive motions, including:

- Fr. Tran’s Motion;
- RCA’s Motion to Dismiss Amended Complaint [Doc. 27];

- Defendant Roman Catholic Archdiocese of Atlanta, Inc.’s (“Archdiocese”) Motions to Dismiss, [Doc. 32] and [Doc. 33];
- RCA and Fr. Tran’s Motion to Strike Plaintiff’s Procedurally Improper “Second Amended Complaint” and Restatement of Prior Filed Respective Motions to Dismiss [Doc. 43]; and
- The Archdiocese’s Motion to Strike Plaintiff’s Procedurally Improper “Second Amended Complaint” and Restatement of Prior Filed Respective Motions to Dismiss [Doc. 49].

Respectfully submitted this 18th day of January 2024.

**BAKER, DONELSON, BEARMAN
CALDWELL & BERKOWITZ, PC**

/s/ Steven R. Press

Steven R. Press

Georgia Bar No. 587199

Tyler Bishop

Georgia Bar No. 566705

3414 Peachtree Road NE, Suite 1500

Atlanta, GA 30326

Telephone: (404) 577-6000

Facsimile: (404) 221-6501

spress@bakerdonelson.com

tbishop@bakerdonelson.com

*Counsel for Defendant Regina Caeli, Inc.,
a/k/a Regina Caeli Academy*

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), the undersigned counsel certifies that the pleading has been prepared in Times New Roman, 14-point type, which is of the font selections approved by the Court in Local Rule 5.1(B).

**BAKER, DONELSON, BEARMAN
CALDWELL & BERKOWITZ, PC**

/s/ Steven R. Press

Steven R. Press

Georgia Bar No. 587199

spress@bakerdonelson.com

*Counsel for Defendant Regina Caeli, Inc.,
a/k/a Regina Caeli Academy*

CERTIFICATE OF SERVICE

This will certify service of a copy of the foregoing was filed and served via the CM/ECF online filing system with the U.S. District Court for the Northern District of Georgia, which will automatically send email notification to all counsel of record.

Respectfully submitted this 18th day of January 2024.

**BAKER, DONELSON, BEARMAN
CALDWELL & BERKOWITZ, PC**

/s/ Steven R. Press

Steven R. Press

Georgia Bar No. 587199

spress@bakerdonelson.com

*Counsel for Defendant Regina Caeli, Inc.,
a/k/a Regina Caeli Academy*